

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

BLUE ORIGIN FEDERATION, LLC,)	
Plaintiff,)	
v.)	
)	
THE UNITED STATES,)	No. 21-1695C
Defendant,)	Judge Richard A. Hertling
and)	
)	
SPACE EXPLORATION TECHNOLOGIES, CORP.,)	
Defendant-Intervenor.)	

**PLAINTIFF’S MOTION FOR LEAVE TO EXCEED PAGE LIMITATION FOR
CROSS-MOTION FOR JUDGMENT ON THE ADMINISTRATIVE RECORD**

Plaintiff Blue Origin Federation, LLC (“Blue Origin”), through its undersigned counsel, respectfully moves pursuant to Rules 5.4(b)(1) and 7(b)(1) of the Rules of the Court of Federal Claims (“RCFC”) for an extension of the page limit applicable to its Cross-Motion for Judgment on the Administrative Record (“Cross-Motion”). In support of this motion, Blue Origin states as follows:

1. RCFC 5.4(b)(1) sets a page limit of fifty (50) pages for a cross-motion brief (excluding the table of contents, list of citations to authority, and appendices), except by leave of Court on motion.

2. During oral arguments held on September 21, 2021, the Court advised the parties that, due to the nature and scope of the issues involved in this matter, the Court would entertain a party’s request to exceed the page limit to ensure adequate justification and support of the arguments made in its Cross-Motion. *See* ECF No. 043.1, 96-97. The Court also directed that any such motions be filed prior to, rather than concurrently with, the Cross-Motion. *Id.* at 97.

3. As Defendant in this action has previously pointed out, the Administrative Record in this action is extensive. Blue Origin respectfully submits that in order to properly explain to the

Court the underlying factual basis, justification, and merits of arguments raised regarding the issues involved in this matter, more than fifty (50) pages are required. In a Cross-Motion of this level of complexity, exceeding the fifty-page limitation will benefit the Court's consideration of the issues in the case and the remedies sought by Blue Origin. Moreover, as the sole party presenting argument on its side of the legal issues, Blue Origin anticipates the need to exceed the page limitation.

4. Blue Origin expects that a page limit of no more than eighty-five (85) pages is sufficient to provide the information necessary to effectively assist the Court's consideration of the arguments raised in its Cross-Motion. Blue Origin will nevertheless strive to keep its brief as short as possible.

5. In light of the foregoing, Blue Origin respectfully requests that this Court grant its request for leave to file a Cross-Motion brief in excess of the fifty (50) page limit in RCFC 5.4(b)(1), but not to exceed eighty-five (85) pages.

September 29, 2021

Respectfully submitted,



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